

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

Docket No. N2012-1

NATIONAL POSTAL POLICY COUNCIL
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS REBECCA ELMORE-YALCH (USPS-T-11) (NPPC/USPS-T11-1-14)
(January 31, 2012)

The National Postal Policy Council ("NPPC"), pursuant to rule 26 of the Commission's rules of practice, respectfully submits the following interrogatories, numbered (NPPC/USPS-T11-1 through 14) to United States Postal Service witness Rebecca Elmore-Yalch (USPS-T-11) and requests a timely answer under oath. If an interrogatory can be more accurately answered by a different witness, please redirect to the appropriate witness.

Please contact the undersigned with any questions.

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Certificate of Service

I hereby certify that I have this 31st day of January, 2012, caused to be served the foregoing document upon the United States Postal Service and the Public Representative in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker
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NPPC/USPS-T11-1: Please refer to your response to GCA/USPS-T11-1. Do you believe that Large Commercial Account respondents in the quantitative market research were probably aware of the Postal Service's proposal regarding Saturday delivery, even if that proposal was not specifically mentioned to them by your research team?

NPPC/USPS-T11-2: Please refer to your response to GCA/USPS-T11-2 and the categories of applications listed at page 5, lines 11 through 21, of your testimony. Were monthly account statements of the nature sent by banks, brokerage firms, and similar financial institutions considered "bills, invoices, or statements," "general communications," or "reports, contracts, policies, legal papers"?

NPPC/USPS-T11-3: Were any of the organizations that participated in one of the 17 "in-depth" interviews of National and Premier Accounts also included in the quantitative research? If so, please indicate how many participated in both types of research.

NPPC/USPS-T11-4: Were the organizations that were part of the quantitative survey of National, Premier, and Preferred accounts provided with written survey forms? If not, was the quantitative research for those accounts conducted entirely by telephone?

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NPPC/USPS-T11-5: Please refer to page 15, lines 22-24, of your testimony. Did the quantitative research screen respondents to ensure that they “decide or influence” *whether* a communication is sent by mail instead of some other type of communication (rather than what type of mail is used)?

NPPC/USPS-T11-6: Please refer to page 16, lines 6 through 8 (and Appendix F). If a business respondent were responsible for the “Bills, invoices, or statements” application but not for the “advertising or marketing materials) application, for what applications should that respondent have provided volume data and estimates?

NPPC/USPS-T11-7: Was the quantitative market research designed to obtain data on the *total* mail volume that a National Account would send under the scenario presented to the respondent, or merely for those applications for which the person had responsibility? Please explain how the market research would have elicited information or estimates for a National Account’s total mail volume.

NPPC/USPS-T11-8: Was the quantitative market research designed to obtain data on the *total* mail volume that a Premier Account would send under the scenario presented to the respondent, or merely for those applications for which the person had responsibility? Please explain how the market research would have elicited information or estimates for a Premier Account’s total mail volume.

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NPPC/USPS-T11-9: Was the quantitative market research designed to obtain data on the *total* mail volume that a Preferred Account would send under the scenario presented to the respondent, or merely for those applications for which the person had responsibility? Please explain how the market research would have elicited information or estimates for a Preferred Account's total mail volume.

NPPC/USPS-T11-10: Please refer page 44, lines 16-17, of your testimony and to your response to GCA/USPS-T11-5(a).

- a. If, in response to the service standard changes described by the market researcher, an organization would likely convert one-half of its marketing correspondence from First-Class Presort Mail to Standard Mail, would you have expected that conversion to be reported in response to the "way" question?
- b. If, in response to the service standard changes described by the market researcher, an organization would likely convert one-half of its marketing correspondence from First-Class Presort 5-digit letter Mail to First-Class Presort 3-digit letter Mail, would you have expected that conversion to be reported in response to the "way" question?
- c. If, in response to the service standard changes described by the market researcher, an organization would likely convert one-half of its account statements from First-Class Presort letter Mail to electronic alternatives, in response to which question would that change appear?

NPPC/USPS-T11-11: Please refer page 50, Figure 42. Does the line labeled "First-Class Mail" refer to Single-Piece mail only?

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NPPC/USPS-T11-12: Please refer to Appendix F of your testimony.

- a. Please confirm that this contains the only script that was used in the quantitative surveys of large commercial accounts. If you cannot confirm, please identify what other script or scripts were used.
- b. Please refer to page 89, lines 10-11, of Appendix F to your testimony. Did you considering phrasing the question (instead of or in addition to the question actually asked) as: "May I please speak with the person in your organization who makes decision and/or recommendations on whether to send communications via mail or electronic means?"
- c. Did you consider whether to ask for the person with budget authority over customer or marketing communications? Either in addition to or instead of the person that makes decisions/recommendations on how to send mail? Please discuss.

NPPC/USPS-T11-13: Please refer to Figures 42 through 44 of your testimony. These figures indicate that, among Presort First-Class mailers, the forecasted volume reduction would be smallest for the largest mailers (National Accounts), largest for the smallest mailers (Preferred Accounts), and in between for Premier accounts. Did the survey identify any factors that would account for these results?

NPPC/USPS-T11-14: For the quantitative surveys conducted using Appendix F:

- a. What guidance was provided to the interviewers regarding how long the survey should take and how much time respondents were given to respond to the questions?
- b. What was the average length of time of a survey interview?